

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, *et al.*,
Plaintiffs,

vs.

KWAME RAOUL, *et al.*,
Defendants.

DANE HARREL, *et al.*,
Plaintiffs,

vs.

KWAME RAOUL, *et al.*,
Defendants.

JEREMY W. LANGLEY, *et al.*,
Plaintiffs,

vs.

BRENDAN KELLY, *et al.*,
Defendants.

FEDERAL FIREARMS
LICENSEES OF ILLINOIS, *et al.*,

Plaintiffs,

vs.

JAY ROBERT “JB” PRITZKER, *et al.*,
Defendants.

Case No. 3:23-cv-209-SPM
** designated Lead Case

Case No. 3:23-cv-141-SPM

Case No. 3:23-cv-192-SPM

Case No. 3:23-cv-215-SPM

STATE DEFENDANTS’ PRETRIAL DISCLOSURES UNDER RULE 26(a)(3)

In accordance with Fed. R. Civ. P. 26(a)(3), Defendants Governor J.B. Pritzker, Attorney General of Illinois Kwame Raoul, and Director of the Illinois State Police Brendan Kelly (together, “State Defendants”), by and through their attorney, Kwame Raoul, disclose the following:¹

I. **Witnesses.** The State Defendants expect to submit testimony from the following witnesses.

¹ These are the disclosures of Defendants Raoul and Kelly in *Barnett, et al., v. Raoul, et al.*, No. 23-cv-209-SPM (S.D. Ill.) and *Harrel, et al., v. Raoul, et al.*, No. 23-cv-141-SPM (S.D. Ill.); Defendant Kelly in *Langley, et al., v. Kelly, et al.*, No. 23-cv-192-SPM (S.D. Ill.); and Defendants Pritzker, Raoul, and Kelly in *Federal Firearms Licensees of Illinois, et al., v. Pritzker, et al.*, No. 23-cv-215-SPM (S.D. Ill.).

A. State Defendants' expert witnesses:

1. James Yurgealitis
2. Philip Andrew
3. Dr. Stephen Hargarten
4. Prof. Robert Spitzer
5. Prof. Randolph Roth
6. Lucy Allen
7. Prof. Jens Ludwig
8. Prof. Dennis Baron
9. Dr. Martin Schreiber
10. Prof. Louis Klarevas
11. Prof. Brian DeLay
12. Col. Craig Tucker (retired)
13. Peter Lucier
14. Lt. Col. Jason Dempsey (retired)

These witnesses may be contacted through State Defendants' counsel. In accordance with the parties' stipulation and the Court's July 25, 2024 order entering the same, the State Defendants expect to present testimony from all of these witnesses by declaration. State Defendants may also present live testimony and/or testimony by deposition from three witnesses: Peter Lucier, Jason Dempsey, and Craig Tucker. State Defendants may also present testimony by deposition from Plaintiffs' experts who have been deposed in these actions, including: Jeffrey Eby, James Ronkainen, Randy Watt, and Paul Leitner-Wise.

B. Fact witnesses.

State Defendants expect to present testimony from these witnesses by deposition:

1. Scott Pulaski, individually and as Rule 30(b)(6) designee of *FFL* Plaintiff Piasa Armory, LLC, Mr. Pulaski may be contacted through *FFL* plaintiffs' counsel.
2. James Curcuruto. Mr. Curcuruto may be contacted through *Barnett* plaintiffs' counsel.

3. Salem Fatohi as Rule 30(b)(6) designee of National Shooting Sports Foundation, Inc., one of the *Barnett* plaintiffs. Mr. Fatohi may be contacted through *Barnett* plaintiffs' counsel.
- C. Illinois State Representative Robert Morgan. Rep. Morgan may be contacted through State Defendants' counsel. State Defendants expect to present testimony from this witness by his February 5, 2023 declaration (ECF 37-2).
- D. If the need arises, the State Defendants may present testimony from a record custodian.

II. Documents or other exhibits. Rule 26(a)(3) requires the identification documents and exhibits the party expects to offer at least 30 days before trial "unless the court orders otherwise." The Court has set a September 11, 2024 deadline for the parties' exhibit lists (ECF 195), and the State Defendants will identify documents at that time.

Dated: August 16, 2024

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

/s/ Christopher G. Wells
Christopher G. Wells, No. 6304265
Chief, Public Interest Division
Office of the Attorney General
115 South LaSalle Street, 31st Floor
Chicago, Illinois 60603
(312) 814-3000
Christopher.Wells@ilag.gov

*Counsel for Attorney General Raoul,
Governor Pritzker, and ISP Director Kelly*

/s/ Kathryn Hunt Muse
Kathryn Hunt Muse, No. 6302614
Deputy Chief, Public Interest Division
Office of the Attorney General
115 South LaSalle Street, 31st Floor
Chicago, Illinois 60603
(312) 814-3000
Kathryn.Muse@ilag.gov

*Counsel for Attorney General Raoul,
Governor Pritzker, and ISP Director Kelly*